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March 12, 2019

VIA ECF AND FIRST CLASS MAIL

Hon. Deborah A. Batts
United States District Court for the Southern District of New York
United States Courthouse
500 Pearl Street, Rm. 2510
New York, NY 10007

Re: L & Leung Leatherware Limited v. Collection XIIX Ltd. and Lisa Nunziata,
No. 1:17-cv-07374-DAB

Dear Judge Batts:

This firm represents defendants/third-party plaintiffs Collection XIIX Ltd. and Lisa Nunziata (“Defendants”) in the above-referenced matter. We write on behalf of all counsel to request the Court’s approval of a further 30 day extension of the discovery end-date and other pre-trial deadlines originally set forth in the Court’s scheduling order dated April 12, 2018 (DE 30).

This Court has previously granted the parties’ joint requests for extension of the discovery deadlines by orders dated September 4, 2018 (DE 33), November 6, 2018 (DE 35), January 3, 2019 (DE 37), and February 26, 2019 (DE 44).

Since the entry of the February 26, 2019 order, counsel for Defendants have been working diligently to transition this matter. Plaintiff L & Leung Leatherware Limited (“Plaintiff”) has noticed the deposition of two additional fact witnesses, who due to the schedules of Defendants’ counsel and the witnesses themselves, are not available for deposition prior to April 12, 2019, the current discovery deadline. In addition, document discovery, served by Defendants on February



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1, 2019 and relating to Plaintiff's damages expert, remains outstanding. Plaintiff has represented that responses to the request will be produced by the end of this week. The parties have met and conferred regarding the status of discovery and are endeavoring to proceed expeditiously.

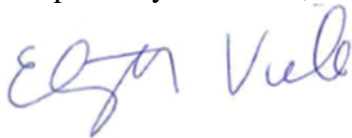
An additional extension is requested to accommodate the scheduling of the depositions, including expert depositions which may be scheduled following Defendants' review of the discovery to be produced by Plaintiff, and to allow Defendants' counsel additional time to get up to speed on this matter.

The parties respectfully request a 30 day extension of the discovery deadline and all other pre-trial dates as previously set forth in the February 26, 2019 order as follows:

- Discovery Deadline: May 13, 2019
- Deadline to Notify Regarding Dispositive Motions: June 13, 2019
- Proposed Requests to Charge and Proposed Voir Dire Due: August 8, 2019
- Joint Pre-trial Statement ("JPTS") Due: August 8, 2019
- Memoranda of Law Addressing Issues in JPTS Due: August 8, 2019
- Responsive Memoranda Due: August 23, 2019

We thank the Court for its attention to this matter.

Respectfully submitted,



Elizabeth C. Viele

cc: Gerry D. Silver, Esq. (via ECF)